

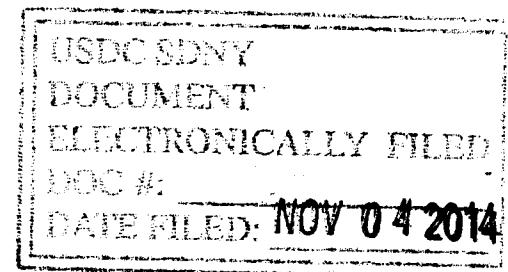


Fw: US v. Bonventre, et. al., 10-cr-228
 Craig Convissar to: Craig Convissar

11/03/2014 05:21 PM

From: Craig Convissar
 To: Craig Convissar

Craig Convissar
 Law Clerk to the Honorable Laura Taylor Swain
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007
 (212) 805 0423



----- Forwarded by Craig Convissar [REDACTED] on 11/03/2014 05:21 PM -----

From: Craig Convissar [REDACTED]
 To: Andrew Frisch <afrisch@andrewfrisch.com>
 Cc: Amanda Bassen <abassen@andrewfrisch.com>, "Breslin, Eric R." <ERBreslin@duanemorris.com>, "gmehler@mehlerlaw.com" <gmehler@mehlerlaw.com>, "Zach, John (USANYS)" <John.Zach@usdoj.gov>, "kyuhas@krantzberman.com" <kyuhas@krantzberman.com>, "lkrantz@krantzberman.com" <lkrantz@krantzberman.com>, "Schwartz, Matthew (USANYS)" <Matthew.Schwartz@usdoj.gov>, "Geller, Melissa S." <MSGeller@duanemorris.com>, "Monteleoni, Paul (USANYS)" <Paul.Monteleoni@usdoj.gov>, "Jackson, Randall (USANYS)" <Randall.Jackson@usdoj.gov>, Roland Riopelle <RRiopelle@sercarzandiopelle.com>, Sarah Lum <sarahjlum@gmail.com>
 Date: 11/03/2014 05:21 PM
 Subject: Re: US v. Bonventre, et. al., 10-cr-228

Counselors,

Judge Swain has requested that I remind you that all objections and requests to the Court are to be made by letter motion filed on ECF (with a courtesy copy to chambers), rather than by email. Going forward, please follow this procedure.

A copy of this email chain will be filed on ECF.

Thank you,
 Craig Convissar

Craig Convissar
 Law Clerk to the Honorable Laura Taylor Swain
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007
 (212) 805 0423

Andrew Frisch

Mr. Convissar: With apologies for adding to your...

11/03/2014 04:28:36 PM

From: Andrew Frisch <afrisch@andrewfrisch.com>
 To: "Breslin, Eric R." <ERBreslin@duanemorris.com>
 Cc: Roland Riopelle <RRiopelle@sercarzandiopelle.com>, "Schwartz, Matthew (USANYS)"

<Matthew.Schwartz@usdoj.gov> [REDACTED] Amanda Bassen <abassen@andrewfrisch.com>, "gmehler@mehlerlaw.com" <gmehler@mehlerlaw.com>, "Zach, John (USANYS)" <John.Zach@usdoj.gov>, "kyuhas@krantzberman.com" <kyuhas@krantzberman.com>, "lkrantz@krantzberman.com" <lkrantz@krantzberman.com>, "Geller, Melissa S." <MSGeller@duanemorris.com>, "Jackson, Randall (USANYS)" <Randall.Jackson@usdoj.gov>, Sarah Lum <sarahjlum@gmail.com>, "Monteleoni, Paul (USANYS)" <Paul.Monteleoni@usdoj.gov>

Date: 11/03/2014 04:28 PM
Subject: Re: US v. Bonventre, et. al., 10-cr-228

Mr. Convissar:

With apologies for adding to your inbox, I've been going through 703 records with an eye toward a short cover letter with attachments. The government's submission runs far afield of what I believed was requested. If the Court wishes, we stand ready to submit a formal motion to strike, or, alternatively, an opportunity to respond with yet more briefing.

Thank you.

Sent from my iPhone

On Nov 3, 2014, at 4:04 PM, "Breslin, Eric R." <ERBreslin@duanemorris.com> wrote:

Mr. Convissar:

We join in Mr. Riopelle's objection. These matters have been briefed and argued. Why does the government just assume they have to right to file another submission without the Court's permission and without any provision for a response by the defense? Mr. Schwartz has filed hundreds of pages of briefing already. The government reserved over 90 minutes for argument last week and, by my reckoning, used all of it. We request some clarification from the Court. Should we respond to this letter or will the Court simply disregard it? We prefer the second option.

<image001.jpg> [REDACTED]

Eric R. Breslin

Partner

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E-MAIL | BIO | VCARD

From: Roland Riopelle [mailto:RRiopelle@sercarzandriopelle.com]
Sent: Monday, November 03, 2014 3:44 PM
To: Schwartz, Matthew (USANYS); ██████████
Cc: abassen@andrewfrisch.com; afrisch@andrewfrisch.com; gmehler@mehlerlaw.com; Zach, John (USANYS); kyuhas@krantzberman.com; lkrantz@krantzberman.com; Geller, Melissa S.; Jackson, Randall (USANYS); Sarah Lum; Breslin, Eric R.; Monteleoni, Paul (USANYS)
Subject: RE: US v. Bonventre, et. al., 10-cr-228

Dear Mr. Convissar:

I do not recall the Judge directing the parties to submit any further papers on these issues, and I object to the submission of this letter brief unless the defendants are permitted to respond to it. If, on the other hand, the Court refuses to consider this unauthorized submission, I will be happy to put my pen away too. Enough is enough, and sometimes more than enough, in my view.

Regards,

Roland G. Riopelle, Esq.
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This message contains confidential and/or privileged material. If you have received it in error, please delete it and advise the sender that you have received it in error.

From: Schwartz, Matthew (USANYS) [mailto:Matthew.Schwartz@usdoj.gov]
Sent: Monday, November 03, 2014 3:28 PM
To: ██████████
Cc: abassen@andrewfrisch.com; afrisch@andrewfrisch.com; gmehler@mehlerlaw.com; Zach, John (USANYS); kyuhas@krantzberman.com; lkrantz@krantzberman.com; Geller, Melissa S.; Jackson, Randall (USANYS); Sarah Lum; Roland Riopelle; Breslin, Eric R.; Monteleoni, Paul (USANYS)
Subject: US v. Bonventre, et. al., 10-cr-228

Mr. Convissar –

Attached please find a letter providing the information Judge Swain requested at the hearing on October 27, 2014. The letter was just filed on ECF, and two hard copies are being sent to chambers. We apologize for taking so long to get this to the Court; we wanted to make sure we understood and answered all of the Court's questions, so we waited until the transcript of the hearing became available this morning. Please let me know if we can provide any additional information.

Matthew L. Schwartz
Assistant U.S. Attorney
1 Saint Andrew's Plaza
New York, New York 10007
Tel.: (212) 637-1945

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

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